

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

RODNEY HINTON, JR.,
Plaintiff,

v.
STATE OF OHIO,
CINCINNATI POLICE DEPARTMENT,
SHERIFF CHARMAINE MCGUFFY, in her
Official and individual capacities,
HAMILTON COUNTY JUSTICE CENTER,
and JOHN DOES 1-10, official and individual
capacities.

Defendants.

Civil Action No. 1:25CV298

**FIRST AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF,
DAMAGES, AND CONSTITUTIONAL VIOLATIONS**

Plaintiff Rodney Hinton Jr., by and through his next friend, files this First Amended Complaint pursuant to 42 U.S.C. §§ 1983 and 1985(3), the 13th and 14th Amendments to the United States Constitution, and applicable federal and state laws, and states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.
2. Venue is proper under 28 U.S.C. § 1391(b), as the events giving rise to this action occurred in Hamilton County, Ohio.

PARTIES

3. Plaintiff Rodney Hinton Jr. is a resident of Ohio and is currently held in pretrial detention at the Hamilton County Justice Center.

4. The defendant State of Ohio is responsible for enforcement and oversight of criminal justice within its jurisdiction.
5. Defendant Cincinnati Police Department is a municipal law enforcement agency whose officers detained and assaulted Plaintiff.
6. Defendant Hamilton County Justice Center is the facility currently detaining Plaintiff and responsible for his unlawful confinement.
7. John Does 1–10 are unknown officers and officials who participated in Plaintiff's unconstitutional detention, assault, and intimidation.

FACTUAL ALLEGATIONS

8. The plaintiff was taken into custody by officers of the Cincinnati Police Department and has been detained without conviction or meaningful bond hearing.
9. The plaintiff appeared visibly beaten during his arraignment, reflecting physical abuse sustained in custody.
10. Multiple officers were present in court during Plaintiff's appearance, creating an atmosphere of fear, surveillance, and intimidation.
11. The process leading to and following Plaintiff's arrest diverged from lawful protocol and reflected bias, retaliation, and systemic misconduct.
12. Defendants' actions violated Plaintiff's rights under the U.S. Constitution, including but not limited to:
 - The 13th Amendment – freedom from involuntary servitude;
 - The 14th Amendment – due process and equal protection;
 - 42 U.S.C. § 1983 – deprivation of rights under color of law;
 - 42 U.S.C. § 1985(3) – conspiracy to deny civil rights.

13. Plaintiff has been held in a system designed to punish, degrade, and silence him without lawful adjudication or legal justification.

CLAIMS FOR RELIEF

COUNT I

UNLAWFUL IMPRISONMENT

(13th & 14th Amendments; 42 U.S.C. § 1983)

14. Defendants caused Plaintiff to be detained unlawfully, without due process, and without a valid conviction.

COUNT II

CONSPIRACY TO DEPRIVE RIGHTS

(42 U.S.C. § 1985(3))

15. Defendants knowingly and willfully conspired to deny Plaintiff's constitutional rights through intimidation, force, and unlawful detainment.

COUNT III

EXCESSIVE FORCE & INTIMIDATION

(14th Amendment; 42 U.S.C. § 1983)

16. Plaintiff was subjected to physical abuse and courtroom intimidation in violation of constitutional protections.

COUNT IV

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

17. Defendants' deliberate actions caused Plaintiff severe psychological trauma, public humiliation, and emotional damage.

COUNT V

BREACH OF OATH OF OFFICE

(Constitutional Malfeasance)

18. Defendants, as sworn public servants, breached their oath to uphold the Constitution by engaging in unlawful, coercive, and unconstitutional conduct.
19. Their actions were performed outside the bounds of legal authority and in contradiction to their sworn duties.

COUNT VI

VIOLATIONS OF FEDERAL RULES OF CRIMINAL PROCEDURE

20. Defendants violated numerous provisions of the Federal Rules of Criminal Procedure, including:
- Rule 5(a): Failure to bring Plaintiff promptly before a magistrate;
 - Rule 5(d): Failure to inform Plaintiff of charges, rights, or release conditions;
 - Rule 46(a): Failure to consider or offer bail;
 - Rules 3 & 4: Procedural failure in warrant and arrest processing.
21. These violations resulted in extended unlawful detention, physical harm, and constitutional injury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court:

1. Issue a declaratory judgment that Plaintiff's constitutional rights under the 13th and 14th Amendments were violated;
2. Grant immediate injunctive relief to review and secure Plaintiff's release pending lawful adjudication;
3. Award compensatory damages in the amount of \$5,000,000, jointly and severally, for physical harm, emotional distress, and loss of liberty;
4. Award punitive damages in the amount of \$20,000,000 to punish and deter egregious misconduct by state actors;
5. Award litigation costs under 42 U.S.C. § 1988;
6. Grant such other and further relief as the Court deems just, proper, and necessary to effectuate justice in this matter.

Respectfully submitted this 9th day of May 2025.

Antoinette Holloway
On behalf of Plaintiff Rodney Hinton, Jr.
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